

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Cook County, Illinois,  
et al.,

Plaintiffs,

v.

Chad F. Wolf, in his official capacity as Acting  
Secretary of U.S. Department of Homeland  
Security,

et. al.,

Defendants.

Case No. 19-cv-6334

Judge Gary Feinerman

**Motion for Stay of Proceedings Pending Appeal**

Defendants respectfully move the Court to stay proceedings in this matter pending appeal of the Court's preliminary injunction order. For the reasons discussed in Defendants' Memorandum in Opposition to ICIRR's Request for Supplemental Discovery and in Support of Motion for Stay of Proceedings, this Court should stay the proceedings in this matter pending resolution of Defendants' appeal. Defendants provided advanced notice to Plaintiffs of this motion, and propose that the parties utilize the pre-existing discovery briefing schedule, *see* ECF No. 104, to address Defendants' Motion to Stay Proceedings and discuss the same during the next conference currently scheduled for January 22, 2020.

Dated: December 5, 2019

Respectfully submitted,

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Assistant Attorney General

ALEXANDER K. HAAS  
Director, Federal Programs Branch

/s/ *Kuntal Cholera* \_\_\_\_\_

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